

### **REMARKS**

Claim 1-15 are pending. Claims 1, 4, 6, and 7 have been amended. Claims 14 and 15 are newly presented. Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

#### ***Claim Rejections Under 35 U.S.C. § 112***

Claim 6 was rejected under 35 U.S.C. § 112, second paragraph. Applicants have amended claim 6 in accordance with the Examiner's suggestion. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

#### ***Claim Rejections Under 35 U.S.C. § 102***

Claims 1-4, 7, 9, and 13 were rejected under 35 U.S.C. § 102(b) over Linliu (U.S. Patent No. 6,287,957) and claims 1 and 7 were rejected under 35 U.S.C. § 102(b) over Kuo (U.S. Patent No. 6,277,727). Applicants respectfully traverse these rejections.

Amended claim 1 recites, in part, a method for fabricating a semiconductor device that includes etching the inter-layer insulation layer to thereby expose a whole upper portion of the conductive patterns.

In contrast, Linliu discloses partially etching the insulating layer 66 and, as shown in Figure 2B, the etching process does not expose the whole upper portion of the conductive patterns. Similarly, Kuo merely discloses partially etching the dielectric layer 40 and, as shown in Figure 9, the etching process does not expose the whole upper portion of the conductive patterns. Accordingly, neither Linliu nor Kuo teach, or even suggest, a method for fabricating a semiconductor device that includes etching the inter-layer insulation layer to thereby expose a whole upper portion of the conductive patterns, as recited in amended claim 1.

Claims 2-4, 7, 9, and 13 are believed allowable for at least the reasons presented above with respect to claim 1 by virtue of their dependence upon claim 1. Accordingly, Applicants respectfully request reconsideration and withdrawal of these rejections.

#### ***Claim Rejections Under 35 U.S.C. § 103***

Claims 5 and 6 were rejected under 35 U.S.C. § 103(a) over Linliu in view of Wang et al. (U.S. Patent No. 6,074,959); claims Claim 8 was rejected under 35 U.S.C. § 103(a) over Linliu in view of Kim et al. (U.S. Patent No. 6,448,179); and claims 10-12 were rejected

under 35 U.S.C. § 103(a) over Linliu in view of Wang et al. (U.S. Patent No. 6,183,655). Applicants respectfully traverse this rejection.

Claims 5, 6, 8, and 10-12 are believed allowable for at least the reasons presented above with respect to claim 1 by virtue of their dependence upon claim 1 and because neither Wang '959, Kim nor Wang '655, separately or collectively, remedy the deficiencies of Linliu discussed above. Accordingly, Applicants respectfully request reconsideration and withdrawal of these rejections.

### **New Claims**

Claims 14 and 15 are newly presented, fully supported by the originally filed specification, and believed allowable over the prior art of record.

### **Conclusion**

Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

Should any issues remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

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